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ATTORNEYS FOR ALL PLAINTIFFS

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO/OAKLAND  
DIVISION

JANE ROE, an individual; MARY ROE,  
an individual; SUSAN ROE, an  
individual; JOHN ROE, an individual;  
BARBARA ROE, an individual;  
PHOENIX HOTEL SF, LLC, a  
California limited liability company;  
FUNKY FUN, LLC, a California limited  
liability company; and 2930 EL  
CAMINO, LLC, a California limited  
liability company,

Plaintiffs,

v.

CITY AND COUNTY OF SAN  
FRANCISCO, a California public entity,

Defendants.

Case No. 4:24-cv-01562-JST

**NOTICE OF OBJECTIONS TO  
SUBPOENAS**

**ASSIGNED FOR ALL PURPOSES  
TO THE HONORABLE DISTRICT  
JUDGE JON S. TIGAR,  
COURTROOM 6**

Action Filed: 03/14/2024  
Trial Date: Unassigned

1 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

2 On January 14, 2025, Plaintiffs Mary Roe, an individual, and Susan Roe, an  
3 individual, (hereafter "Plaintiffs") served objections on Defendant City and County of  
4 San Francisco and third-party deposition officers at West Coast Legal Services in  
5 regard to Subpoenas to Produce Documents, Information, or Objects or to Permit  
6 Inspection of Premises in a Civil Action to Curry Senior Center Health Clinic,  
7 regarding Plaintiff Susan Roe, and Mercy Doctors Medical Group, UCSF Medical  
8 Center, UCSF Medical Center (patient accounts)/Medical Group Business Services  
9 and UCSF Medical Center & UCSF Mt. Zion (Radiology Dept), regarding Plaintiff  
10 Mary Roe. Plaintiffs objected on the grounds that the subpoenas are overbroad and  
11 seek private medical information not at issue.

12 Plaintiffs will meet and confer with counsel to clarify the documents requested  
13 and preserve any and all objections to the subpoenas once those issues are clarified.

14  
15 Dated: January 15, 2025

WALKUP, MELODIA, KELLY & SCHOENBERGER

16  
17 By: 

18 MICHAEL A. KELLY  
19 RICHARD H. SCHOENBERGER  
20 MATTHEW D. DAVIS  
21 ASHCON MINOIEFAR  
22 Attorneys for ALL PLAINTIFFS  
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**PROOF OF SERVICE**

**Jane Roe, et al. v. City and County of San Francisco, et al.  
USDC-Northern California Case No. 4:24-cv-01562-JST**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the county where the mailing took place, My business address is 650 California Street, 26th Floor, City and County of San Francisco, CA 94108-2615.

On the date set forth below, I caused to be served true copies of the following document(s) described as

**NOTICE OF OBJECTIONS TO SUBPOENA**

to:

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8 **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the  
document(s) with the Clerk of the Court by using the CM/ECF system. Participants  
9 in the case who are registered CM/ECF users will be served by the CM/ECF system.  
Participants in the case who are not registered CM/ECF users will be served by mail  
or by other means permitted by the court rules.

10  
11 I declare under penalty of perjury under the laws of the United States of  
America that the foregoing is true and correct and that I am employed in the office of  
a member of the bar of this Court at whose direction the service was made.

12 Executed on January 15, 2025, at San Francisco, California.  
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Kirsten Benzien  
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